

Presented to the Court by the foreman of the Grand Jury in open Court, in the presence of the Grand Jury and FILED in the U.S. DISTRICT COURT at Seattle, Washington.

June 27 2018
WILLIAM M. McCOOL, Clerk
By [Signature] Deputy

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

PAUL MICHEAL BERGIN,

Defendant.

NO. **CR 18-5363 RJB**

INDICTMENT

The Grand Jury charges that:

COUNT 1

(Enticement of a Minor)

Between November and December of 2017, at Tacoma, within the Western District of Washington, and elsewhere, PAUL MICHEAL BERGIN, used a facility and means of interstate and foreign commerce, including the internet, to knowingly persuade, induce, entice, and coerce MV1, an individual who had not yet attained the age of 18 years, to engage in sexual activity for which any person can be charged with a criminal offense—to include, the production of child pornography as defined in 18 U.S.C. § 2256(8)—and attempted to do so.

All in violation of Title 18, United States Code, Sections 2422(b) and 2427.

ALLEGATIONS OF FORFEITURE

The allegations contained in Count 1 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures to the United States pursuant to Title 18, United States Code, Section 2428(a).

Upon conviction of the offense alleged in Count 1 of this Indictment, the defendant, PAUL MICHEAL BERGIN, shall forfeit to the United States any property, real or personal, used or intended to be used to commit or to promote the commission of such offense, or any property traceable to such property; any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense, including but not limited to the following:

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1 a. One white Motorola cell phone seized from PAUL MICHEAL BERGIN on
2 or about June 7, 2018.

3 A TRUE BILL:

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5 DATED: 6-27-18

6 *(signature of the foreperson redacted*
7 *pursuant to the policy of the Judicial*
8 *Conference of the United States)*

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12 FOREPERSON

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ANNETTE L. HAYES
United States Attorney

KATHERYN KIM FRIERSON
Assistant United States Attorney

MATTHEW P. HAMPTON
Assistant United States Attorney